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Subject: Comment on WRDA Principles & Guidelines 060308

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Revised Comments on WRDA Principles & Guidelines

(8) Existing Studies. The policy of keeping these studies valid just because they were done leaves a lot to be desired. One does not want to do the work over again, However, the call for reforming and revising these guidelines has often been driven by finished studies that have left basic needs unsatisfied for the community, the environment, and has promoted a bad feeling against the Corps and a kind of schizophrenia among those needing to carry out projects that are no longer seen as suitable.

Just because a project study is done is not sufficient reason not to look at it again for cause. Some conditions for this need to be allowed and specified.

For instance, in New Orleans, in the neighborhood where I live and have my family, there is a project for which the study has long been done. Much time has passed since then (1997) and conditions have greatly changed, yet the project has been exempted from REAL reconsideration in the WRDA 2007 and apparently under these current guidelines. Even the original study was much objected to at the time, a situation that has endured for years and gotten worse over time, because public objections to the gratuitous projections used for the study have been overrun by reality, and the economic basis for the project has changed but the project has not, and there is a stalemate because the principles are too rigid. The project is the New Lock Project for the IHNC, formerly the MRGO New Lock and Connecting Channels Project. It is widely viewed as a boondoggle for special interests because of its lack of economic justification, environmental impacts, and community opposition. A lot of this can be attributed to its closed and discriminatory planning under present guidelines.

There needs to be a mechanism of recourse for all projects to be reexamined for cause, and I do not see this in the guidelines/principles where it needs to be. There must be objectivity regarding all previously studied projects, including especially those not yet built, because so often they are not yet built for very good reasons, such as public opposition, not the same as NIMBY.

The public needs to have more involvement in project development. It is time for the Corps processes to be transparent and more shared with the public. The right of and invitation to the public to have access to planning documents continually through the planning process needs to be included in principles and guidelines.

Regarding comment periods, I believe these are most often too short under current conditions where the public is allowed into the process only at the end. Comment periods need to be longer and better notice given to the public as long as the planning process remains proprietary and closed to the public. The process of project development often takes years, and documents in varying degrees of completion are passed around between federal and state agencies but not available to the public. This needs to be changed to allow more access throughout the process, and more interactive communication. This is the cyber age, not 1790. The comment periods would be fine with constant public involvement, but are far too short without it. With enough earlier public involvement the comment period would be a time of affirmation, not contention.

As an example, I witnessed Corps managers at a small meeting in preparation for a much larger one to announce a major project. Someone said one small thing to these representatives—the most obvious observation---and the Corps went back into a planning cocoon for another year at great public expense that could have been avoided by involving the public early on. Often the public is most involved and interested and can contribute, yet state and federal agency heads and personnel dominate the discussion by default---because the public is let in only at the end. This is a very wasteful process, and consumes too much time because of the revisions found necessary to months of work often in unproductive direction discovered only in public comment. I am constantly amazed by the lack of imagination in projects, a component of planning that could easily be supplied by the public to have plans move along more smoothly from start to finish.

In sum, I think the public has a right to earlier and more constant involvement in the planning processes [as lobbyists are, apparently]. I think a change to allow this in the principles would make for more timely and satisfactory progress and approval of major projects on their merits. I think it is absolutely imperative to broaden the dialogue at every step of the process to turn special interest projects into public interest projects. There needs to be a principle that says Corps planning processes will be transparent and open at every stage of development, and a provision for public comment all along the process from start to finish. Planning is for the public alongside Corps professionals and should use today's technologies to avoid the limitations of the past. Of course there will be problems with this! But none that we cannot improve.. The merely tweaked past will just not do, however.

Perhaps there would be a new lock already built somewhere for the GIWW in New Orleans if the public had been invited in and not systematically excluded except for small windows to see unacceptable final products with foregone results. But the new lock is not built, and perhaps never will be, if things do not change in these matters, and entombed studies are not revisited with fresh eyes.

Please change these principles and guidelines so they will work in a new century. I have not wanted to comment on how the government protects our water resources. However, I feel in this case the medium is the message. If we are going to have water resources protected I believe we must change not just what we protect but how, and how broadly and inclusively deliberations and decisions are made in shorter times.

Thank you.

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